1	E. BRENT BRYSON, LTD.
2	E. BRENT BRYSON, ESQ. Nevada Bar No. 4933
3	3202 w. Charleston Blvd. Las Vegas, Nevada 89102
4	702-364-1234 Telephone 702-364-1442 Facsimile
5	ebbesqltd@yahoo.com
6	and
7	ROBERT M. DRASKOVICH, ESQ. THE DRASKOVICH LAW GROUP
8	Nevada Bar No. 6275 815 S. Casino Center Dr.
9	Las Vegas, NV 89101 702-474-4222 Telephone
10	702-474-1320 Facsimile
10	Attorneys for Plaintiff
	UNITED STATES DISTRICT COURT
12	DISTRICT OF NEVADA
13	SOMMER RICHARDS, individually, Case No.: 2:19-cv-02043-JAD-BNW
14	) Plaintiffs, )
15	
16	VS. )
17	ONDRE WILLS, in his individual and ) ECF No. 25 official capacity; LAS VEGAS )
18	METROPOLITAN POLICE )
19	DEPARTMENT; DOE OFFICERS I-X ) inclusive,; and ROES XI-XX inclusive, )
20	)
21	Defendants. )
22	STIPULATION AND ORDER TO EXTEND TIME FOR PLAINTIFF TO RESPOND TO
23	DEFENDANTS' MOTION FOR SUMMARY JUDGMENT
24	
25	(FIRST REQUEST)
26	Pursuant to LR 7-1, Plaintiff Sommer Richards ("Plaintiff"), by and through her counsel
27	of record, E. Brent Bryson, Esq. of the law offices of E. Brent Bryson, Ltd., and Robert M.
28	Draskovich, Esq. of The Draskovich Group, and Defendants Las Vegas Metropolitan Police

8

9

10

11

12

13

14

15

16

17

18

19

Department ("LVMPD") and Ondre Wills ("collectively "Defendants"), by and through their attorneys of record, Craig R. Anderson, Esq., of the law offices of Marquis Aurbach Coffing, hereby submit their stipulation, request and order extending Plaintiff's time to respond to Defendants' motion for summary judgment by twenty-eight (28) days, up to and including Tuesday, August 10, 2021.

Defendants' motion for summary judgment was filed on June 22, 2021. Plaintiff's response is therefore due by or on July 13, 2021. The Parties hereby stipulate and agree to allow Plaintiff an additional twenty-eight (28) days to respond by opposition, up to and including August 10, 2021. In support of this stipulation and request, the Parties state as follows:

This request for an extension of time is not sought for any improper purpose or other purposes of delay but because Plaintiff's Counsel must unexpectedly prepare for a trial that has been rescheduled to commence on August 2, 2021, an earlier date as a result of prior COVID related delays. This is the first request to allow Plaintiff additional time to respond. The parties respectfully submit that the reasons set forth above constitute compelling reasons to allow the Plaintiff additional time to respond by opposition to Defendants' motion for summary judgment.

///

20 ///

21 ///

22

/// 23

24 ///

25 ///

26 ///

27

/// 28

1	Sommer Richards v. Ondre Wills, et al Case No.: 2:19-cv-02043
2	WHEREFORE, upon agreement by and between the parties, through their respective
4	counsel, the undersigned counsel requests that this Court grant the parties' stipulation to extend
5	time for Plaintiff to respond to Defendants' motion for summary judgment by an additional
6	twenty-eight (28) days, up to and including August 10, 2021.
7	APPROVED AS TO FORM AND CONTENT this 8 <sup>th</sup> day of July, 2021.
8	By: /s/ Craig R. Anderson By: /s/ E. Brent Bryson
9	Craig R. Anderson, Esq. E. Brent Bryson, Esq.
	MARQUIS AURBACH E. BRENT BRYSON, LTD.
10	COFFING 3202 W. Charleston Blvd.
10	
11	10001 Park Run Drive Las Vegas, NV 89102
11	Las Vegas, Nevada 89145 Attorney for Plaintiff
12	Attorney for Defendants
13	
14	ORDER
15	IT IS SO ORDERED.
16	II IS SO ORDERED.
17	2084
18	U.S. District Judge Jennifer A. Dorsey Dated: July 12, 2021
19	
20	
21	
22	
23	
<ul><li>24</li><li>25</li></ul>	
26	
27	
28	